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April 7, 2022

Honorable Judge Kenneth M. Karas  
United States District Judge  
Southern District New York  
300 Quarropas Street  
White Plains, New York 10601

Re: Trustees of the District Council No. 9 et al. v. American Venture Construction et al.  
Docket No. 21-cv-00737

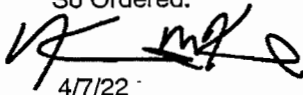
Dear Honorable Judge Karas:

This firm represents the Plaintiffs in the above referenced matter. I write jointly with counsel for the Defendants to request a two month extension of the deadline to file any pre-motion letters. The parties are making this request because an audit of the books and records of American Venture Construction has been conducted by Plaintiffs. The Parties are now in the rebuttal stage of the audit process and are in the midst of exchanging information and reviewing the status of every employee listed in the very lengthy audit report. Neither Party can properly make a motion until the audit is finalized.

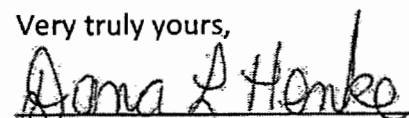
We thank the Court for its consideration to this matter.

Granted.

So Ordered.

  
4/7/22

Very truly yours,

  
Dana L. Henke

cc: Karen Mizrahi, Esq.  
Counsel for Defendants